

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:25-cr-00224-HEA-SRW
	)	
	)	
	)	
LUIS SANCHEZ-VELAZQUEZ,	)	
	)	
Defendant.	)	

**DEFENDANT’S FIRST MOTION FOR ADDITIONAL TIME IN WHICH TO FILE  
PRETRIAL MOTIONS**

COMES NOW defendant, Luis Sanchez-Velazquez, by and through counsel, Assistant Federal Public Defender, Andrew Cortopassi, and moves this Court to grant his motion for additional time in which to file Pretrial Motions. In support of this motion, counsel states the following:

1. The date for filing Pretrial Motions is June 13, 2025.
2. Defense counsel is currently in the process of reviewing discovery, collecting records, further investigating the case, and conducting legal research into the viability of pretrial motions to suppress.
3. Defendant is currently being detained by Immigration and Customs Enforcement (ICE) in a detention facility in Phelps County, Missouri.
4. To determine whether pretrial motions will be necessary, counsel needs additional time to review discovery, further investigate this case, collect records, conduct legal research, discuss the matter with defendant, and engage in discussions with the government regarding a potential disposition of this matter.

5. A continuance in this matter is in the interests of justice as it allows a reasonable time for counsel to be properly prepared pursuant to 18 U.S.C. §3161. Counsel and defendant believe the ends of justice are served by granting defendant's motion and outweigh the best interests of the public and of the defendant in a speedy trial.

WHEREFORE, for the reasons stated above, counsel requests an extension of time, up to and including July 30, 2025, in which to file pretrial motions.

Respectfully submitted,

/s/ Andrew Cortopassi  
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Attorney for Defendant

### **CERTIFICATE OF SERVICE**

I hereby certify that on June 13, 2025, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Nichole Frankenberg, Assistant United States Attorney.

/s/ Andrew Cortopassi